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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC., *et al.*

Debtors.

Chapter 11

Case No. 08-13555 (JMP)

(Jointly Administered)

**JOINDER AND RESERVATION OF RIGHTS OF ELLIOTT MANAGEMENT
CORPORATION AND KING STREET CAPITAL MANAGEMENT, L.P.
IN SUPPORT OF OBJECTION OF PLAN ADMINISTRATOR TO MOTIONS FOR
LEAVE TO EXAMINE LEHMAN BROTHERS HOLDINGS INC. PURSUANT TO
FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004 AND JOINDERS THERETO**

Elliott Management Corporation (“Elliott”) and King Street Capital Management, L.P. (“King Street,” and together with Elliott, the “Transaction Parties”), as parties to a settlement agreement with LB Holdings Intermediate 2 Limited (in administration) (“LBHI2”), hereby joins in the Objection¹ of the Plan Administrator to the motions of CarVal Investors, LLC (“CarVal”) and Davidson Kempner Capital Management LLC (“DK”) for leave to examine LBHI pursuant to Federal Rule of Bankruptcy Procedure 2004 and the various joinders thereto

¹ On October 21, 2013, Lehman Brothers Holdings Inc. (“LBHI”), as plan administrator under the *Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors* (the “Plan Administrator”), filed its *Objection of Plan Administrator to Motions for Leave to Examine Lehman Brothers Holdings Inc. Pursuant to Federal Rule of Bankruptcy Procedure 2004 and Joinders Thereto* (the “Objection”) [Docket No. 40611].

(collectively, the “2004 Motions”).²

RESERVATION OF RIGHTS

The Transaction Parties reserve all of their rights to: (i) present arguments and be heard at any hearing regarding the 2004 Motions; (ii) file supplemental materials and papers; (iii) object to any specific request for documents or examination pursuant to Rule 2004; (iv) submit their own request for documents or examination pursuant to any Rule 2004 Order; (v) seek protective orders; and (vi) request any further relief as may be appropriate.

CONCLUSION

The Transaction Parties respectfully request that this Court deny the 2004 Motions.

DATED: New York, New York
October 22, 2013

By: /s/ Stephen E. Hessler
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² Joinders to the 2004 Motions also were filed by the Baupost Group, L.L.C. (“Baupost”), see *Joinder of the Baupost Group, L.L.C. to Motion of CarVal Investors, LLC for Leave to Examine BHI Pursuant to Federal Rule of Bankruptcy Procedure 2004* [Docket No. 40497], the Ad Hoc Group of Lehman Brothers Creditors, see *Statement of the Ad Hoc Group of Lehman Brothers Creditors in Response to the Motion of CarVal Investors, LLC for Leave to Examine LBHI Pursuant to Federal Rule of Bankruptcy Procedure 2004* [Docket No. 40520], Attestor Capital LLP (“Attestor”), see *Joinder of Attestor Capital LLP in Support of Motions of CarVal Investors, LLC and Davidson Kempner Capital Management LLC for Leave to Examine LBHI Pursuant to Federal Rule of Bankruptcy Procedure 2004* [Docket No. 40543], and SPCP Group, LLC (“SPCP” and together with CarVal, DK, Baupost, the Ad Hoc Group of Lehman Brothers Creditors and Attestor, the “Movants”), see *Limited Joinder of SPCP Group, to (1) Motion of CarVal Investors, LLC for Leave to Examine LBHI Pursuant to Federal Rule of Bankruptcy Procedure 2004 and (2) and Motion of Davidson Kempner Capital Management LLC for Leave to Examine LBHI Pursuant to Federal Rule of Bankruptcy Procedure 2004* [Docket No. 40539].